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*Lead Counsel, Interim Class Counsel, and  
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Refrigeration Industry Health and Welfare  
Trust Fund, Fire and Police Health Care  
Fund, San Antonio, and Plumbers Local  
Union No. 1 Welfare Fund*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

IN RE VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC. THIRD-PARTY  
PAYOR LITIGATION

Civil Action No. 3:16-cv-3087-MAS-LHG

District Judge Michael A. Shipp

Magistrate Judge Lois H. Goodman

Special Master Dennis M. Cavanaugh,  
U.S.D.J. Ret.

**NOTICE OF LEAD COUNSEL'S MOTION  
FOR ATTORNEYS' FEES AND LITIGATION EXPENSES**

To: All persons on ECF service list

**PLEASE TAKE NOTICE** that on December 2, 2021, at 10:00 a.m., either in Courtroom

1 of the United States District Court for the District of New Jersey, Clarkson S. Fisher Building &

U.S. Courthouse, 402 E. State St., Trenton, NJ 08608, or by telephone or videoconference (in the discretion of the Court), Lead Counsel will and hereby do move the Court, before the Court-appointed Special Master, the Honorable Dennis M. Cavanaugh, for an order granting an award of attorneys' fees and litigation expenses in the above-captioned class action.

PLEASE TAKE FURTHER NOTICE that, in support of the Motion, the undersigned intend to rely on the accompanying Memorandum of Law and the accompanying Joint Declaration of James A. Harrod and James E. Cecchi and exhibits attached thereto, and the papers and pleadings filed in this Action, the arguments of counsel, and any other matters properly before the Court.

PLEASE TAKE FURTHER NOTICE that, a proposed order granting the relief requested herein will be submitted in connection with Lead Counsel's reply submission, which will be filed no later than November 24, 2021, pursuant to the Court's August 17, 2021 Orders Preliminarily Approving Settlement and Providing for Notice (ECF Nos. 196, 197).

Dated: October 28, 2021

**CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO, P.C.**

/s/James E. Cecchi

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#3061725

**CERTIFICATION OF SERVICE**

I hereby certify that on October 28, 2021, I caused a true and correct copy of the foregoing Notice of Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses to be electronically filed with the Clerk of the Court using the ECF system. Notice of this filing will be sent to counsel of record by operation of the Court's electronic filing system.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge.

Dated: October 28, 2021

*s/ James E. Cecchi* \_\_\_\_\_

James E. Cecchi

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